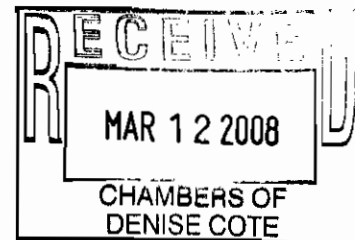


MEMO ENDORSED



MICHAEL A. CARDOZO
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March 11, 2008

BY HAND DELIVERY

Honorable Denise L. Cote
United States District Judge
Southern District of New York
500 Pearl St., Room 1040
New York, New York 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 3/12/08

Re: Catherine Bracho v. City of New York et al., 08-CV-1476 (DLC) (JCF)¹

Your Honor:

As the Assistant Corporation Counsel assigned to the defense of the above-referenced civil rights action, I write to respectfully request that defendant City of New York's time to answer or otherwise respond to the complaint in this action be enlarged sixty (60) days from March 11, 2008 to and including May 10, 2008. I have conferred with plaintiff's counsel, Tracie A. Sundack, Esq., and she consents to this initial request for an enlargement of time.²

The complaint alleges, *inter alia*, that on December 26, 2006, New York City Police Department officer "Jane Lee" and several other unidentified police officers falsely arrested and subsequently maliciously prosecuted plaintiff in violation of her state and federal

¹ This case has been assigned to Assistant Corporation Counsel Katherine E. Smith, who is presently awaiting admission to the bar and is handling this matter under supervision. Ms. Smith may be reached directly at (212) 513-0462.

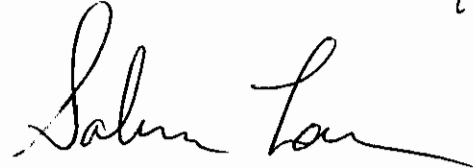
² A check of the docket sheet indicates that affidavits of service of the summons and complaint have not been filed with respect to the individual identified in the caption of the complaint as "Police Officer Jane Lee," nor has she requested representation from this office. Without making any representations on behalf of the aforementioned individual, it is respectfully requested that, in the event she was served, her time to respond to the complaint similarly be enlarged so that her defenses are not jeopardized while representational issues are being decided.

civil rights. As a threshold matter, an enlargement of time will allow this office to forward to plaintiff for execution authorizations for the release of the underlying arrest, criminal prosecution and medical records. Defendant cannot obtain these records without the authorizations, and without the records, defendant cannot properly assess this case or respond to the complaint. Accordingly, defendant requires this enlargement so that this office may obtain the underlying documentation, properly investigate the allegations of the complaint and fulfill its obligations under Rule 11 of the Federal Rules of Civil Procedure.

No previous request for an enlargement of time has been made. Accordingly, defendant City of New York respectfully requests that its time to answer or otherwise respond to the complaint be enlarged sixty (60) days from March 11, 2008 to and including May 10, 2008.

I thank Your Honor for considering the within request.

Respectfully submitted,



Sabrina Tann (ST 2552)
Assistant Corporation Counsel
Special Federal Litigation Division

*Granted.
J. Cole
March 12,
2008*

cc: Tracie A. Sundack, Esq.
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Fax: 914-946-9585
(By Facsimile)